## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
V.	)	CR. NO. 2:05cr137-F
	)	
GEORGE DAVID SALUM III	)	

# **GOVERNMENT'S SUPPLEMENTAL REQUEST TO CHARGE: CHARACTER EVIDENCE - GOVERNMENT WITNESS**

COMES NOW the United States of America, by and through its attorneys, Gregory R.

Miller, United States Attorney for the Northern District of Florida, and the undersigned Assistant

United States Attorney, and moves this Honorable Court to charge the jurors as follows:

#### **CHARACTER OF A WITNESS**

You have heard opinion evidence about the character trait of Johnny G. White, Jr. for truthfulness. You should consider this evidence in deciding the weight that you will give to Witness White's testimony.

Reference: Seventh Circuit Pattern Jury Instructions - Criminal, Instr. No. 3.12; Fed. R. Evid. 404(a)(2), 404(a)(3), and 608.

RESPECTFULLY SUBMITTED this 10<sup>th</sup> day of November, 2005.

GREGORY R. MILLER **United States Attorney** 

#### /s/Dixie A. Morrow

DIXIE A. MORROW Assistant United States Attorney Florida Bar No. 0354589 Georgia Bar No. 525543 Texas Bar No. 24034796 Northern District of Florida 21 E. Garden Street, Suite 400 Pensacola, Florida 32502 (850) 444-4000

#### CERTIFICATE OF SERVICE

I hereby certify that I have this date served a copy of the foregoing GOVERNMENT'S SUPPLEMENTAL REQUEST TO CHARGE: CHARACTER EVIDENCE - GOVERNMENT WITNESS upon the defendant by electronic filing with and noticing by the Clerk of Court with notice delivery to his counsel of record: Julian L. McPhillips, Jr., McPHILLIPS SHINBAUM LLP, Post Office Box 64, Montgomery, Alabama 36101.

THIS 10<sup>th</sup> day of November, 2005.

### /s/Dixie A. Morrow

DIXIE A. MORROW **Assistant United States Attorney** Florida Bar No. 0354589 Georgia Bar No. 525543 Texas Bar No. 24034796 Northern District of Florida 21 E. Garden Street, Suite 400 Pensacola, Florida 32502 (850) 444-4000

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